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September 12, 1994

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SEP 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Caton:

Transmitted herewith, on behalf of Christian Television of Ohio, Inc., licensee of Television Station WSFJ, Newark, Ohio, are an original and four (4) copies of its Petition for Rulemaking, filed pursuant to Commission Rule 76.51 (47 C.F.R. §76.51) to be included in the Columbus-Chillicothe TV market.

Should questions arise relative to this filing, please communicate with the undersigned.

Very truly yours,



Robert L. Olender
Counsel for
CHRISTIAN TELEVISION OF OHIO,
INC.

RLO:bpt
Enclosures
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**Before the
Federal Communications Commission
Washington, D.C. 20554**

SEP 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)	CS Docket No. 94-
)	
Request by Christian Television of)	
Ohio, Inc.)	
)	
To Amend Section 76.51 of the)	
Commission's Rules to include)	
Newark, Ohio in the Columbus -)	
Chillicothe Television Market)	

To: Chief, Cable Services Bureau

PETITION FOR RULEMAKING

Christian Television of Ohio, Inc. ("CT"), licensee of Television Station WSFJ, Newark, Ohio, by its counsel, hereby submits its Petition for Rulemaking to include Newark, Ohio in the Columbus-Chillicothe, Ohio Television Market pursuant to Commission Rule 76.51 (47 C.F.R. §76.51).

DISCUSSION

The Commission has enunciated its position that stations meeting certain criteria would be eligible to change the designation of a television market. In its Cable Television Report and Order, 36 FCC 2d 143, 176 (1972) the Commission acknowledged the need to equalize the competitive status where stations are in economic competition. WSFJ is in urgent need of economic parity with the other Columbus Television stations.

If Newark is made a part of this market, cable systems in the vicinity of Columbus will have an opportunity to carry WSFJ without concern for adverse financial implications

because of copyright obligations. Moreover, WSFJ is in competition with other market stations for portions of its programming, and is in need of the same historic and prospective consideration that the Commission has and will extend to stations in similar positions.¹

In evaluating requests for hyphenation of a market, the Commission has considered some or all of the following factors as relevant to its examination:²

1. The distance between the proposed community and the existing designated communities.
2. Whether cable carriage, if afforded to the subject station, would extend to areas beyond its Grade B signal coverage area.
3. The presence of a clear showing of a particularized need by the station requesting the change of market designation.
4. An indication of benefit to the public from the proposed change.

In addition, the Commission in its Report and Order 8 FCC Rcd. 2965, 2977-78 n.50 released March 29, 1993 (MM Docket No. 92-259) indicated that it expects to receive evidence that demonstrates commonality between the proposed community to be added to a market designation and the market as a whole. A

¹See request by TV 14, Inc. to include Rome, Georgia in the Atlanta, Georgia Television Market (RM-8016), 72 RR 2d 204 (1993).

²See Major Television Markets (Fresno-Visalia, California) 57 RR 2d 1122, 1124 (1985).

review of the following significant facts show that there is ample commonality between Newark and the Columbus market:

1. Newark is in the Columbus ADI.³
2. Newark is in Licking County, which is the second largest of the 19 counties in the ADI, but even more important is the fact that Licking County is one of the counties that make up the Metro Survey Area according to Arbitron.
3. The Columbus television stations have significantly viewed status in Licking County.
4. The Columbus network affiliate television stations place a Grade A signal over Newark.⁴
5. There are also common cultural, social and economic interests between the residents in these areas.

Thus, there is clearly commonality between Newark and Columbus to warrant the expansion of this market to include Newark.

The Commission has defined a hyphenated television market as one characterized by more than one major population center supporting all stations in the market but with competing stations licensed to different cities within the market area. As is evident herein, WSFJ is a part of the Columbus-Chillicothe market, and is competing with stations licensed to these cities.

³See Attachment A which is a copy of page C-140 from the Broadcasting and Cable Yearbook, 1994 showing the Arbitron ADI (Area of Dominant Influence) for the Columbus, Ohio, television market.

⁴See Attachment B which are contour maps of the four Columbus network stations from TV and Cable Factbook No. 62, 1994 and for Station WWAT from the FCC's files.

Affixed hereto, as Attachment C, is a WSFJ contour map in which it has been determined that the distance between Newark to Columbus is approximately 32 miles, computed from the center of Newark to the center of Columbus.⁵ It should be further noted that WSFJ puts a Grade A signal over the east side of Columbus, and a Grade B from central Columbus to the west side which the Commission considers as determinative.

CT has a particularized need for requesting the change of market designation. Because of non-duplication and syndicated exclusivity, CT can't buy programs for just Newark, because it places a Grade B signal over Columbus. Therefore, syndicators will only sell CT programs that haven't been bought in Columbus and, if they do, they will charge Columbus prices. Consequently, since CT can't buy programs based on a small market pricing, the only way that WSFJ can compete is to be placed in the same parity as the Columbus stations.

Furthermore, CT cannot pay Columbus prices for programs and also be required to pay distant signal copyright fees. If WSFJ is considered a distant signal under the new must-carry

⁵Also, as a point of comparison, in renaming the Columbus, Ohio, market to include Chillicothe, the distance between Chillicothe and Columbus was 50 miles. See, Report and Order, (infra. Footnote 1, para. 50.) In addition, in the Lawrence, Massachusetts, case approved by the Commission May 5, 1994, (MM Docket No. 93-291) the Commission was influenced by the fact that another designated community in the market (Worcester) was a greater distance from Boston than Lawrence. The same is true with Chillicothe which distance is greater than the present proposal. Furthermore, in the Rome, Georgia case approved by the Commission, (infra, footnote 1) the distance between Rome to Atlanta was 58 miles, greater than the present proposal.

laws, the cable systems will not be obligated to carry WSFJ unless CT indemnifies the cable system for the added copyright fees.⁶ These copyright costs are significant for a non-profit station with an annual budget of about one million dollars. Approximately, 50 percent of that budget must be raised through private donations which would be diverted to offset copyright costs.

Furthermore, it should be pointed out that WSFJ operates on Channel 51, a frequency with extremely restricted spacing requirements. To meet these FCC restrictions, WSFJ's tower had to be located in an area where the FAA will not allow its height to exceed 500 feet above ground level. Thus, it is virtually impossible to upgrade WSFJ's facilities to improve its current signal or expand its broadcast coverage area. One of the only ways WSFJ can improve its coverage is through an increase in cable carriage within its market. There are other systems within its market to which WSFJ could provide a good quality signal, however, potential copyright costs prohibit

⁶See, Report and Order, *infra*, par. 114. Also, by example, see letter dated September 1, 1994 from Warner Cable indicating that the anticipated fee for 1994 would be \$19,000 which would have to be paid or carriage would be discontinued at the end of 1994. (Attachment D). In addition, Continental Cablevision which serves Circleville, Ohio has advised CT that its copyright payments will be approximately \$2,500 for the first six months of 1994 despite the fact that WSFJ provides a good quality signal to the headend of the cable system and the city of Circleville falls within WSFJ's Grade B coverage contour, but lies outside of the 35 mile radius from the reference point of Newark, Ohio. Inclusion of Newark, Ohio in the Columbus-Chillicothe, Ohio market would allow the 35 mile zone to be measured from Columbus as well as Newark and Circleville falls within the 35 mile zone of Columbus.

pursuit of this growth option.

WSFJ sees these obstacles to facility improvement and growth to be very clear threats to its long-term viability. WSFJ exists in a marketplace where increasing competition from a number of sources threatens the viability of all but the strongest over-the-air broadcasters. Independent stations face changes brought about by HDTV, from loosely regulated low powers who clone distant satellite programming, from DBS and from more traditional satellite delivered programming on cable, thus yielding a smaller piece of the pie and even fewer options for growth. At stake is more than just the viability of WSFJ but the future of free broadcast TV in the service and access that local broadcasters provide to the people in their own market. Although WSFJ would receive some expanded cable rights beyond its Grade B contour, (approximately 3-5 miles on the west side of Columbus) it would not be beyond its present rights in as much as WSFJ is in the ADI.

With regard to the last criteria, which is the public interest consideration, the proposed change will benefit the public since it will enable WSFJ to insure continued viability. If WSFJ is not permitted to effectively compete in the Columbus market place, it will not survive. WSFJ is the first local commercial independent television service for Newark and thus it provides that community with a vehicle of local expression. The Commission can take official notice of the financial circumstances facing a small market UHF

television station such as WSFJ. That is particularly true where the station is a religious/family station, seeking to provide wholesome programming to its viewers not currently available in the market. WSFJ is the only Christian television station in the entire central Ohio area. If WSFJ is shut out by unreasonable copyright obligations, then the public will lose out this new inspirational service not available to thousands of central Ohio residents.

Aside from the close physical proximity of Newark to Columbus, (about 16 miles between their nearest borders between the two cities), there are additional factors of social, economic and cultural commonality between Newark and Columbus.

- a. Newark has come to be known as a satellite community of Columbus, much to the objection of those Newark residents who do not want to be swallowed up by the growing Columbus metro area.
- b. WBNS-TV (CBS affiliate, Columbus) has in recent years maintained a "Newark bureau", although it does not currently.
- c. The Columbus Dispatch prints a Licking County edition, once weekly, featuring news predominately from Newark and the surrounding communities.
- d. Network affiliates in Columbus, regularly covers news stories from Newark and Licking County including key political races, events affecting the Newark employment climate and items of public concern and safety, significant traffic accidents, entertainment and cultural events in the Newark and Licking County area, etc.
- e. Licking County is included in the Central

Ohio Operational Area of the Emergency
Broadcast System.

- f. The Central Ohio Transit Authority (COTA), provider of bus service to the city of Columbus, also operates an express shuttle bus service between Columbus and Newark.
- g. Newark is included in the Columbus Metropolitan Statistical Area (MSA) relative to EEO matters.

ACCORDINGLY, it is submitted that CT has, beyond peradventure, established a clear case in equity and law for inclusion in the Columbus market so that it will become the Columbus-Newark market and will serve the public interest by meeting the underlying purposes of the market hyphenation rule to equalize competition among stations in genuine competition.

Respectfully submitted,

CHRISTIAN TELEVISION OF OHIO,
INC.

By: 

Robert L. Olender
Its Counsel

**BARAFF, KOERNER, OLENDER
& HOCHBERG, P.C.**
5335 Wisconsin Avenue, N.W.
Suite 300
Washington, D.C. 20015
(202) 686-3200

September 12, 1994

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ATTACHMENT A

ADI TV Households: 710,900

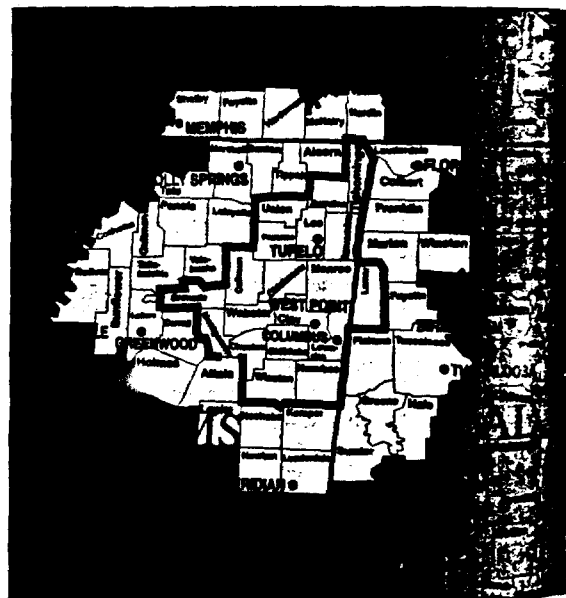
WCMH Columbus, Ohio, ch. 4, NBC
WSYX Columbus, Ohio, ch. 6, ABC
WBNS-TV Columbus, Ohio, ch. 10, CBS
WTTT Columbus, Ohio, ch. 28, Fox
WOSU-TV Columbus, Ohio, ch. 34, ETV
WSFJ Newark, Ohio, ch. 52, IND
WWAT Chillicothe, Ohio, ch. 53, IND

ADI	TV
Counties	State Households
Coshocton	OH 13,300
Crawford	OH 18,300
Delaware	OH 25,500
Fairfield	OH 37,900
Fayette	OH 10,300
Franklin	OH 395,500
Hardin	OH 11,200
Hocking	OH 9,500
Knox	OH 17,500
Licking	OH 49,100
Madison	OH 12,000
Marion	OH 23,500
Morgan	OH 5,100
Morrow	OH 10,000
Perry	OH 11,400
Pickaway	OH 15,500
Pike	OH 9,100
Ross	OH 24,500
Union	OH 11,700

ADI TV Households: 170,300

***WMAB-TV** Mississippi State, Miss., ch. 2, ETV
WCBI-TV Columbus, Miss., ch. 4, CBS
WTVB Tupelo, Miss., ch. 9, NBC
***WMAE-TV** Booneville, Miss., ch. 12, ETV
WLOV-TV West Point, Miss., ch. 27, ABC

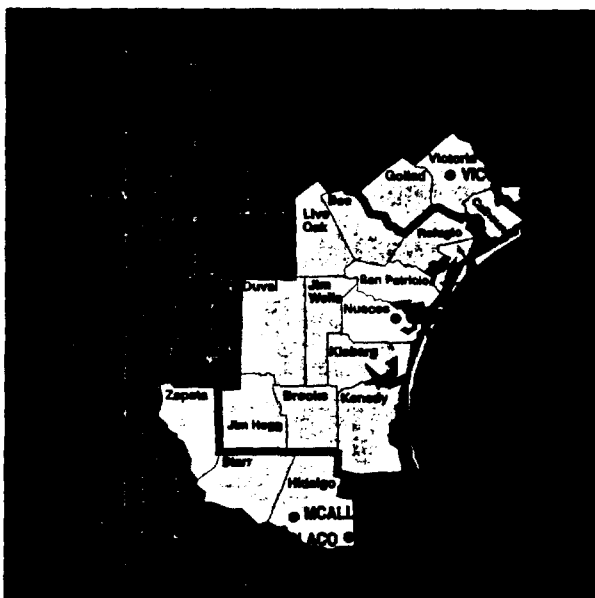
ADI		TV			
Counties	State	Households			
Lamar	AL	5,900	Montgomery	MS	4,400
Calhoun	MS	5,700	Noxubee	MS	3,900
Chickasaw	MS	6,500	Oldibbeha	MS	13,000
Choctaw	MS	3,200	Pontotoc	MS	8,600
Clay	MS	7,300	Prentiss	MS	8,700
Grenada	MS	7,700	Tishomingo	MS	7,200
Itawamba	MS	7,400	Union	MS	8,500
Lee	MS	26,200	Webster	MS	3,700
Lowndes	MS	21,900	Winston	MS	6,900
Monroe	MS	13,600			



ADI TV Households: 173,800

KIII Corpus Christi, Tex., ch. 3, ABC
KRIS-TV Corpus Christi, Tex., ch. 6, NBC
KZTV Corpus Christi, Tex., ch. 10, CBS
***KEDT-TV Corpus Christi, Tex., ch. 16, ETV**
KORO Corpus Christi, Tex., ch. 28, IND

ADI Counties	State	TV Households
Aransas	TX	7,400
Bee	TX	8,700
Brooks	TX	2,700
Duval	TX	4,000
Jim Hogg	TX	1,700
Jim Wells	TX	11,900
Kenedy	TX	100
Kleberg	TX	9,600
Live Oak	TX	3,200
Nueces	TX	102,900
Refugio	TX	2,900
San Patricio	TX	18,700



ATTACHMENT B

Ohio—Columbus

WTTE

Ch. 28

Network Service: Fox.

Licensee: WTTE Channel 28 Licensee Inc., Box 280, Columbus, OH 43216-0280.

Studio: 6130 Sunbury Rd., Westerville, OH 43081-9312.

Telephone: 614-895-2800. **Fax:** 614-895-3159.

Technical Facilities: Channel No. 28 (554-560 MHz). Authorized power: 1910-kw max. visual, 191-kw max. aural. Antenna: 965-ft. above av. terrain, 1124-ft. above ground, 2044-ft. above sea level.

Latitude 40° 09' 33.50"
Longitude 82° 55' 21.50"

Transmitter: 6680 State Rte. 3, Westerville.

Satellite Earth Stations: Comtech, 7.3-meter; Harris, 6.1-meter; Harris, 3-meter Ku-band; Microdyne, Standard Communications receivers.

News Service: UPI.

Ownership: Sinclair Broadcast Group Inc. (Group Owner).

Began Operation: June 1, 1984.

Represented (sales): TeleRep Inc.

Represented (legal): Fisher, Wayland, Cooper & Leader.

Represented (engineering): Carl T. Jones Corp.

Personnel:

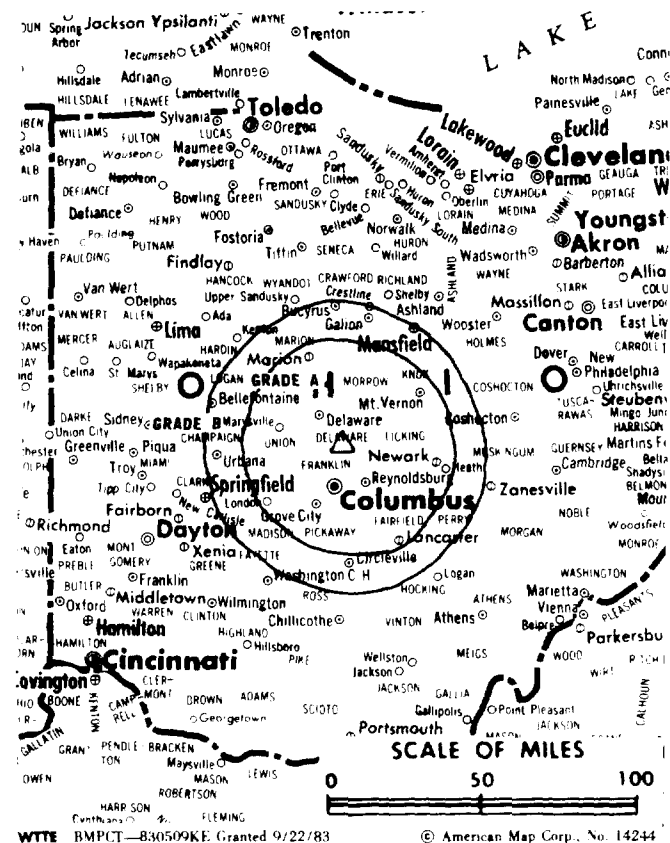
David D. Smith, President.
John T. Quigley, General Manager.
Robert H. Heyde, General Sales Manager.
Michael C. Summers, Local Sales Manager.
Jeff Avon, National Sales Manager.
Oran D. Gough, Operations Director.
Susan Burton, Promotion Director.
Vida Burns, Business Manager.
Joe Subich, Chief Engineer.

Rates: On request.


City of License: Columbus. **ADI:** Columbus, OH. **Rank:** 34.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	OHIO			
	Delaware	24,500	24,300	99
	Fairfield	37,700	37,400	99
	Franklin	388,100	384,500	99
	Knox	17,500	17,300	99
	Licking	48,200	47,700	99
	Madison	12,200	12,000	98
	Marion	23,400	23,200	99
	Morrow	9,900	9,800	99
	Muskingum	31,100	30,600	98
	Perry	11,400	11,200	98
	Pickaway	15,800	15,700	99
	Ross	24,600	24,200	98
	Union	11,500	11,300	98



Net Weekly Circulation	State County	Total Households	TV Households	%
Between 25-49%	OHIO			
	Coshocton	13,600	13,300	98
	Crawford	18,500	18,200	98
	Hardin	11,300	11,100	98
	Hocking	9,600	9,400	98
	Logan	16,400	16,200	99
Between 5-24%	OHIO			
	Athens	20,500	20,000	98
	Champaign	13,700	13,500	99
	Fayette	10,200	10,000	98
	Guernsey	14,800	14,500	98
	Highland	13,600	13,300	98
	Holmes	9,600	9,200	96
	Pike	9,100	8,900	98
Station Totals		878,400	867,600	99
	Net Weekly Circulation (1993)		466,500	
Average Daily Circulation (1993)			200,800	



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Ohio—Columbus

WBNS-TV

Ch. 10

Network Service: CBS.

Licensee: WBNS-TV Inc., Box 1010, Columbus, OH 43216.

Studio: 770 Twin Rivers Dr., Columbus, OH 43215.

Mailing Address: Box 1010, Columbus, OH 43216.

Telephone: 614-460-3700. **TWX:** 810-482-1619. **Fax:** 614-460-2812.

Technical Facilities: Channel No. 10 (192-198 MHz). Authorized power: 316-kw visual, 31.6-kw aural. Antenna: 945-ft. above av. terrain, 1029-ft. above ground, 1749-ft. above sea level.

Latitude 39° 58' 16"
Longitude 83° 01' 40"

Transmitter: 776 Twin Rivers Dr.

Multichannel TV Sound: Stereo and separate audio program.

Satellite Earth Stations: Harris, 6.1-meter C-band; Harris, 6.1-meter Ku-band; Harris receivers.

AM Affiliate: WBNS, 5-kw (1-kw night), 1460 kHz.

FM Affiliate: WBNS-FM, 16-kw, 97.1 MHz (No. 246), 780-ft.

News Services: AP, CBS, CNN, UPI.

Ownership: Dispatch Printing Co. (Group Owner).

Began Operation: October 5, 1949.

Represented (sales): Blair Television; Paul Mulvihill Ltd.

Represented (legal): Crowell & Moring.

Represented (engineering): David Steel & Associates Inc.

Personnel:

Thomas S. Stewart, Vice President & General Manager.

Doug Parker, Program Manager.

Marvin C. Born, Vice President, Engineering.

Jerry Cary, Treasurer.

Gary Lowell, General Sales Manager.

Tim D'Angelo, National Sales Manager.

Phil Pikelnny, Director of Marketing & Promotion.

Mike Berry, Production Manager.

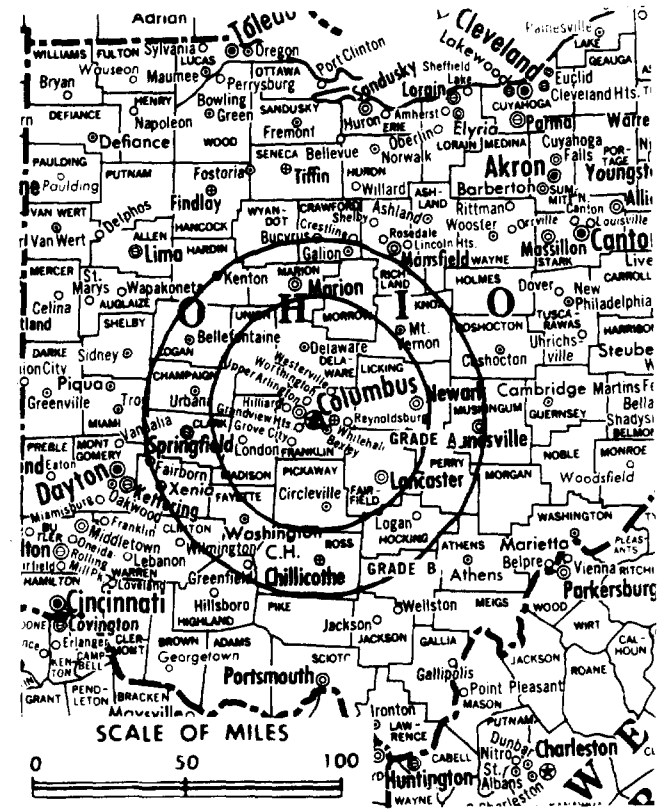
Charles White, Public Service Director.

Rates: On request.

City of License: Columbus. **ADI:** Columbus, OH. **Rank:** 34.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	OHIO			
	Coshocton	13,600	13,300	98
	Crawford	18,500	18,200	98
	Delaware	24,500	24,300	99
	Fairfield	37,700	37,400	99
	Fayette	10,200	10,000	98
	Franklin	388,100	384,500	99
	Hardin	11,300	11,100	98
	Hocking	9,600	9,400	98
	Knox	17,500	17,300	99
	Licking	48,200	47,700	99
	Logan	16,400	16,200	99
	Madison	12,200	12,000	98
	Marion	23,400	23,200	99
	Morrow	9,900	9,800	99
	Muskingum	31,100	30,600	98
	Perry	11,400	11,200	98
	Pickaway	15,800	15,700	99
	Pike	9,100	8,900	98
	Ross	24,600	24,200	98



WBNS-TV BMP1-T-800507KF Granted 3.30.81

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Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	Union	11,500	11,300	98
Between 25-49%	OHIO			
	Athens	20,500	20,000	98
	Champaign	13,700	13,500	99
	Clark	55,700	55,200	99
	Guernsey	14,800	14,500	98
	Jackson	11,300	11,100	98
	Morgan	5,200	5,100	98
	Richland	48,200	47,600	99
	Scioto	29,800	29,300	98
	Vinton	4,100	4,000	98
Between 5-24%	Washington	23,600	23,100	98
	Wyandot	8,200	8,100	99
	WEST VIRGINIA			
	Wood	34,100	33,800	99
	KENTUCKY			
	Greenup	13,500	13,400	99
	OHIO			
	Ashland	17,400	17,200	99
	Auglaize	16,400	16,200	99
	Clinton	13,400	13,200	99
Station Totals	Gallia	11,400	11,100	97
	Hancock	25,000	24,700	99
	Highland	13,600	13,300	98
	Holmes	9,600	9,200	96
	Lawrence	23,000	22,600	98
	Meigs	8,700	8,500	98
	Noble	4,100	4,000	98
	Shelby	16,000	15,800	99
	WEST VIRGINIA			
	Jackson	9,800	9,700	99
	Mason	9,700	9,600	99
Station Totals		1,205,400	1,190,100	99
Net Weekly Circulation (1993)			759,900	
Average Daily Circulation (1993)			430,900	

Ohio—Columbus

WSYX

Ch. 6

Network Service: ABC.

Licensee: Continental Bcstg. Ltd., 441 Vine St., Suite 3900, Cincinnati, OH 45202.

Studio: 1261 Dublin Rd., Columbus, OH 43215.

Mailing Address: Box 718, Columbus, OH 43216.

Telephone: 614-481-6666. **Fax:** 614-759-0448.

Technical Facilities: Channel No. 6 (82-88 MHz). Authorized power: 100-kw visual, 20-kw aural. Antenna: 535-ft. above av. terrain, 672-ft. above ground, 1400-ft. above sea level.

Latitude 40° 01' 02"
Longitude 83° 01' 11"

Holds CP for change to 938-ft. above av. terrain, 1006-ft. above ground, 1716-ft. above sea level, lat. 39° 56' 16", long. 83° 01' 16", transmitter to Stimel Rd., 0.62-mi. W of I-71, Franklin County. BPCT-910211KG.

Transmitter: 350 W. Dodridge St.

Satellite Earth Stations: Harris, 9-meter C-band; Andrew, 7.3-meter C-band; Andrew, 4.5-meter C-band; Superior, 5-meter Ku & C-band; Avantek, Harris, Standard Communications receivers.

News Services: ABC, AP, NIWS, UPI.

Ownership: Continental Broadcasting Ltd. (Group Owner).

Began Operation: September 29, 1949. Sale to Taft Bcstg. by Picture Waves Inc. approved by FCC Feb. 25, 1953 (Television Digest, Vol. 9:9). Sale to Anchor Media Holding Ltd. approved by FCC Dec. 3, 1987. Transfer of control to present owners granted June 30, 1993.

Represented (sales): Petry Television Inc.

Represented (legal): Hogan & Hartson.

Represented (engineering): Smith & Powstenko.

Personnel:

Terry Connelly, Vice President & General Manager.

Pete Ford, Vice President of Engineering.

Rob Wagley, General Sales Manager.

Pat Cramer, Local Sales Manager.

Toni McHugh, National Sales Manager.

Steve Doerr, News Director.

John Schnabel, Business Manager.

Jim Strader, Creative Services Director.

Highest 30 Sec. Rate: \$5000.

NETWORK BASE HOURLY RATE: \$1875.

City of License: Columbus. **ADI:** Columbus, OH. **Rank:** 34.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	OHIO			
	Crawford	18,500	18,200	98
	Delaware	24,500	24,300	99
	Fairfield	37,700	37,400	99
	Fayette	10,200	10,000	98
	Franklin	388,100	384,500	99
	Hocking	9,600	9,400	98
	Knox	17,500	17,300	99
	Licking	48,200	47,700	99
	Logan	16,400	16,200	99
	Madison	12,200	12,000	98
	Marion	23,400	23,200	99
	Morrow	9,900	9,800	99
	Muskingum	31,100	30,600	98



WSYX BPCT-910211KG Granted 1/21/93

© American Map Corp., No. 14244

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	Perry	11,400	11,200	98
	Pickaway	15,800	15,700	99
	Pike	9,100	8,900	98
	Ross	24,600	24,200	98
	Union	11,500	11,300	98
Between 25-49%	OHIO			
	Athens	20,500	20,000	98
	Coshocton	13,600	13,300	98
	Hardin	11,300	11,100	98
	Highland	13,600	13,300	98
	Jackson	11,300	11,100	98
	Morgan	5,200	5,100	98
	Noble	4,100	4,000	98
	Richland	48,200	47,600	99
	Scioto	29,800	29,300	98
	Vinton	4,100	4,000	98
Between 5-24%	Washington	23,600	23,100	98
	Wyandot	8,200	8,100	99
	WEST VIRGINIA			
	Wood	34,100	33,800	99
	KENTUCKY			
	Greenup	13,500	13,400	99
	Lewis	4,700	4,600	98
	OHIO			
	Champaign	13,700	13,500	99
	Clark	55,700	55,200	99
	Clinton	13,400	13,200	99
	Guernsey	14,800	14,500	98
	WEST VIRGINIA			
	Jackson	9,800	9,700	99
	Mason	9,700	9,600	99
Station Totals		1,082,600	1,069,400	99
Net Weekly Circulation (1993)			714,800	
Average Daily Circulation (1993)			371,000	

Ohio—Columbus

WCMH

Ch. 4

Network Service: NBC.

Licensee: Outlet Communications Inc., 3165 Olentangy River Rd., Columbus, OH 43202.

Studio: 3165 Olentangy River Rd., Columbus, OH 43202.

Telephone: 614-263-4444. **Fax:** 614-447-9017.

Technical Facilities: Channel No. 4 (66-72 MHz). Authorized power: 100-kw visual, 15-kw aural. Antenna: Circularly polarized, 900-ft. above av. terrain, 1029-ft. above ground, 1749-ft. above sea level.

Latitude 39° 58' 15"
Longitude 83° 01' 39"

Transmitter: 766 Twin Rivers Dr., Columbus.

Multichannel TV Sound: Stereo only.

Satellite Earth Station: Transmit/receive Harris, 5-meter Ku-band; Scientific-Atlanta, 10-meter C-band; Vertex, 4.6-meter Ku-band; DX Antenna, Harris, Scientific-Atlanta receivers.

News Services: AP, Conus, NBC.

Ownership: Outlet Communications Inc. (Group Owner).

Began Operation: April 3, 1949. Sale to The Outlet Co. by Avco Bcstg. Corp. approved by FCC Dec. 22, 1975 (Television Digest, Vol. 15:21, 52). Sale to Rockefeller Group approved Nov. 23, 1983 (Vol. 23:19, 22, 26:6). Sale by Rockefeller Group approved April 29, 1986.

Represented (sales): Katz American Television.

Personnel:

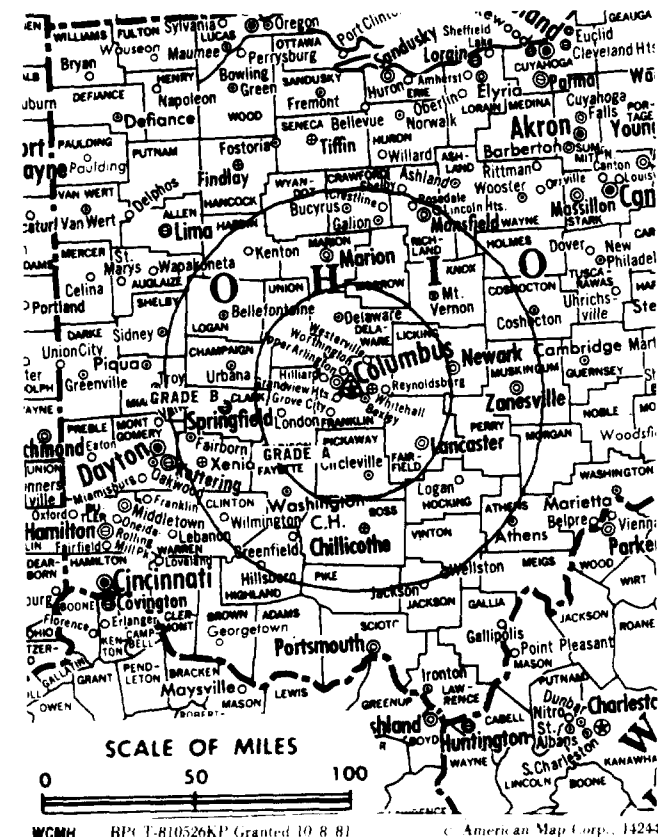
Douglas E. Gealy, Vice President & General Manager.
Bill Lanese, General Sales Manager.
Dick Groat, Local Sales Manager.
Mike Cash, National Sales Manager.
J. Lawrence Pozzi, Chief Engineer.
Tom Burke, News Director.
Janna Buckey, Promotion Manager.
Bob Shaw, Operations Manager.
Karen Giblin, Business Manager.
Danelle Ochenduski, Production Manager.

Rates: On request.

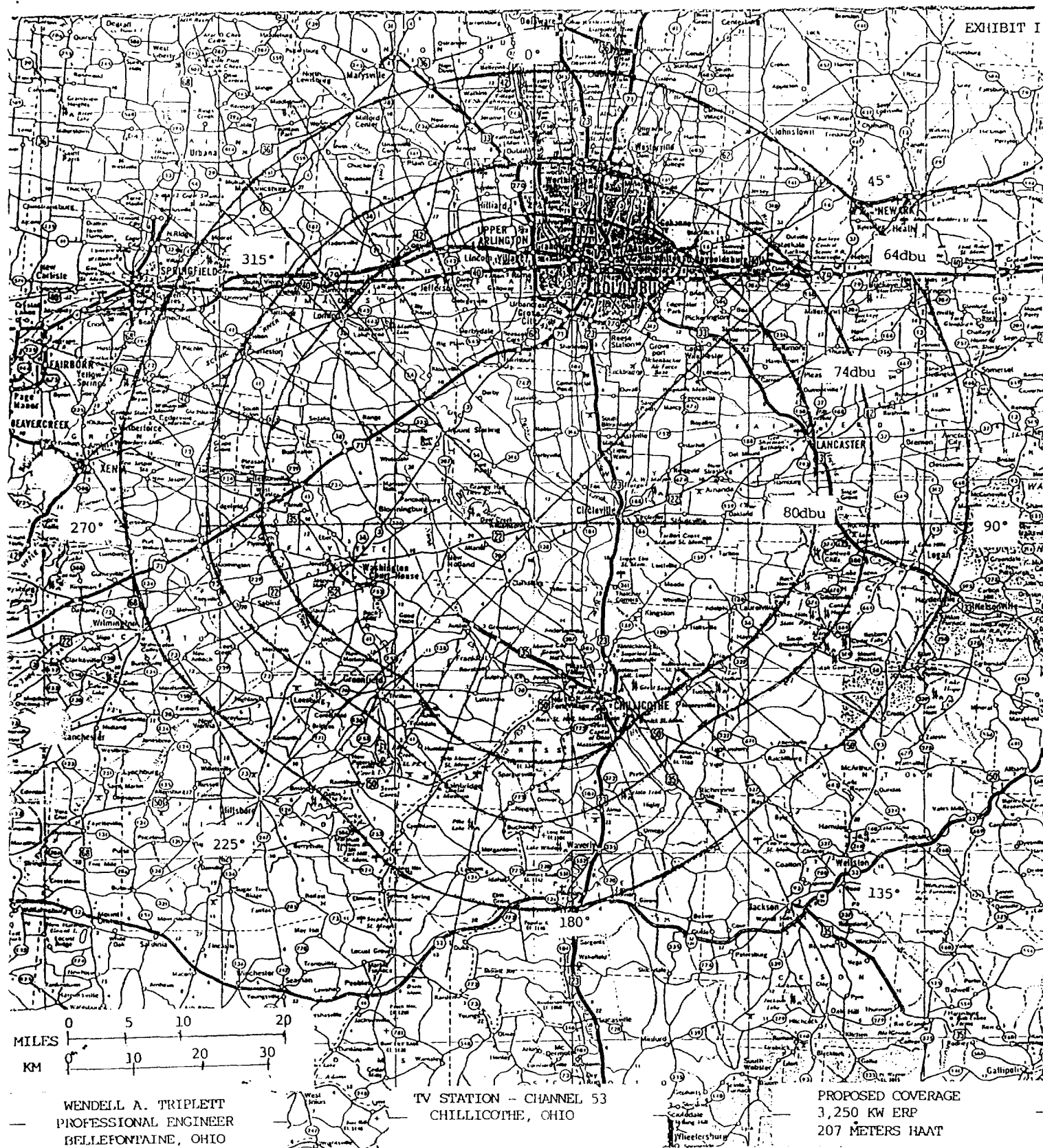
City of License: Columbus. **ADI:** Columbus, OH. **Rank:** 34.

Total Households: ©MSI Consumer Market Data as of 1/1/93. TV Homes, TV% and Circulation ©1993 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	OHIO			
	Champaign	13,700	13,500	99
	Coshocton	13,600	13,300	98
	Crawford	18,500	18,200	98
	Delaware	24,500	24,300	99
	Fairfield	37,700	37,400	99
	Fayette	10,200	10,000	98
	Franklin	388,100	384,500	99
	Hocking	9,600	9,400	98
	Knox	17,500	17,300	99
	Licking	48,200	47,700	99
	Logan	16,400	16,200	99
	Madison	12,200	12,000	98



Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	OHIO			
	Marion	23,400	23,200	99
	Morrow	9,900	9,800	99
	Perry	11,400	11,200	98
	Pickaway	15,800	15,700	99
	Pike	9,100	8,900	98
	Ross	24,600	24,200	98
	Union	11,500	11,300	98
	Vinton	4,100	4,000	98
	OHIO			
Between 25-49%	Athens	20,500	20,000	98
	Hardin	11,300	11,100	98
	Jackson	11,300	11,100	98
	Muskingum	31,100	30,600	98
	Richland	48,200	47,600	99
Between 5-24%	OHIO			
	Adams	9,600	9,300	97
	Clark	55,700	55,200	99
	Clinton	13,400	13,200	99
	Guernsey	14,800	14,500	98
	Highland	13,600	13,300	98
	Morgan	5,200	5,100	98
	Scioto	29,800	29,300	98
	Shelby	16,000	15,800	99
	Tuscarawas	32,300	31,800	98
	Wyandot	8,200	8,100	99
Station Totals		1,041,000	1,028,100	99
Net Weekly Circulation (1993)			702,600	
Average Daily Circulation (1993)			412,600	



ATTACHMENT C

SEPTEMBER 1983

FIGURE - 1

PREDICTED COVERAGE CONTOURS

CHRISTIAN TV OF OHIO
STATION WSFJ (TV)
NEWARK, OHIO

CH:51

720 kW

620'

LECHMAN, COLLIGAN & JOHNSON
TELECOMMUNICATIONS CONSULTANTS

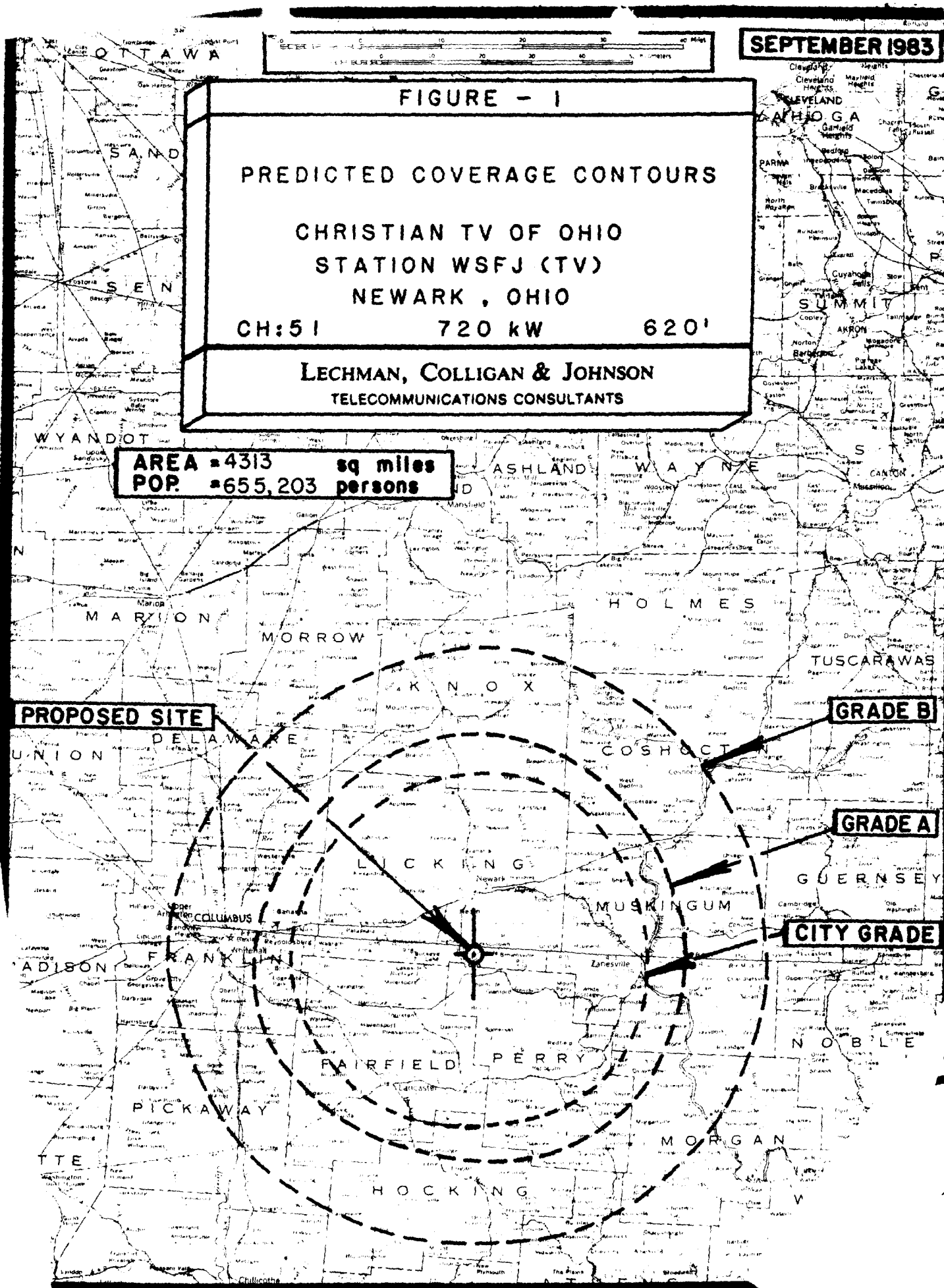
AREA = 4313 sq miles
POP. = 655,203 persons

PROPOSED SITE

GRADE B

GRADE A

CITY GRADE



ATTACHMENT D



WARNER CABLE

COLUMBUS DIVISION
1266 Dublin Road • P.O. Box 2553
Columbus, Ohio 43216
614-481-5000
Fax: 614-481-5044

September 1, 1994

Mr. Teddy W. Ross
General Manager
WSFJ TV-51
10077 Jacksontown Road
Thornville, OH 43076

Dear Mr. Ross:

This letter is being sent to you pursuant to the provisions of Section 76.58(d)(2) of the Rules of the Federal Communications Commission and constitute notice that our cable system's carriage of the signal of station WSFJ causes an increased copyright liability for the Columbus Division of Time Warner Cable.

A recent audit conducted by the Copyright Office determined that WSFJ is partially distant to a portion of our service area. Although WSFJ is classified as a "specialty station", a fee of .00563 of the revenues for the distant service area must be remitted to the Copyright Office. These fees are anticipated to be \$19,000 for 1994. Warner Cable must have a written commitment from WSFJ to indemnify it for these fees, or carriage of WSFJ will be discontinued at the end of 1994.

We are prepared to discuss this matter with you at a mutually convenient time. Please contact me at 481-5290 concerning this issue.

Sincerely,

John C. Porter
President

JCP:csg